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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ESTATE OF LACY LLOYD THOMAS,

Plaintiff

vs.

CLARK COUNTY, NEVADA,

Defendant

Case No. 2:18-cv-01615-CDS-MDC

**STIPULATION AND ORDER TO  
EXTEND BRIEFING  
DEADLINES PERTAINING TO  
DEFENDANT’S MOTION FOR  
SUMMARY JUDGMENT**

[ECF No. 97]

Pursuant to Federal Rule of Civil Procedure (“FRCP”) 6, this Court’s Local Rule LR IA 6-1 and Local Rule of Civil Practice 7-1, the parties hereby jointly submit this Stipulation to extend the current briefing deadlines related to Defendant’s motion for summary judgment (“MSJ”) previously filed on November 22, 2024. *See* ECF No. 96. At present, Plaintiff’s response to the pending dispositive motion is due on December 13, 2024. *Id.* Defendant’s reply to Plaintiff’s response would be due 14-days thereafter or December 27, 2024. Counsel for the respective parties having conferred regarding this Stipulation, and based upon their various case commitments, agree that good cause supports this request to extend the

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briefing deadlines related to Defendant's pending MSJ. This is the parties' *first request* for an extension of time for the purpose and reasons set forth herein.

Good cause supports this request because counsel for the respective parties each have a number of litigation deadlines in other cases that will impact their ability to dedicate the appropriate time to completing the briefing that remains with respect to the MSJ. For instance, although undersigned counsel for Plaintiff has been diligently working to complete a response to the MSJ, he was required to travel outside Las Vegas for business purposes during the past week and is expected to participate in taking the deposition of a physician in a complex medical malpractice case this week (December 12, 2024); both events having significantly impacted the time he has been able to dedicate to completing a response to the MSJ. Counsel for Defendant is equally busy with a number of other case commitments and, under the current briefing schedule, will be required to complete a reply over the Christmas holiday season which will impact his vacation plans and other case commitments.

Given that discovery has been completed in this case and that the Court has not yet set a trial date, a continuance of the current briefing schedule will not delay proceedings. In light of the foregoing, the parties respectfully request that the Court approve this Stipulation to permit Plaintiff to file a response to the MSJ on or before January 7, 2025 and for Defendant to file a reply to that response on or before January 21, 2025.

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1 For the reasons set forth above, the parties respectfully request that the Court approve  
2 this Stipulation for a short extension of time to complete briefing pertaining to the pending  
3 MSJ.

4 DATED this 10<sup>th</sup> day of December 2024.

7 Respectfully submitted,

8 /s/ Thomas W. Dillard

/s/ Paul S. Padda

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*Counsel for Plaintiff*

15 **IT IS SO ORDERED:**

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19 **UNITED STATES DISTRICT JUDGE**

20 **DATED:** December 12, 2024

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